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7 UNITED STATES BANKRUPTCY COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 **In re:** **Case No. 10-73669 WJL**

10 **KATHERINE MICKELS,** **Chapter 13**

11 **Debtor.**

MOTION TO MODIFY CHAPTER 13 PLAN

12 _____ /
13 The above-named debtor applies to the court for an order to modify her
14 Chapter 13 Plan as follows:

15 Debtor's daughter will pay a lump sum payment of \$1,000.00 electronically
16 via TFS Bill Pay to be received the Trustee on or before November 13, 2015, at
17 which point the debtor's Chapter 13 plan shall be deemed complete. Any plan
18 arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid
19 on a pro-tanto basis.

20 The modification is sought on the following grounds:

21 Debtor had a stroke in September 2015, and was briefly hospitalized as a
22 result. Debtor was discharged from the hospital and upon returning to her home
23 she suffered a second stroke. Debtor was unable to make her plan payments during
24 that time, has massive medical bills, and is being cared for by her daughter.

25 Dated: November 2, 2015

/s/ Anne Y. Shiau

26 ANNE Y. SHIAU

Attorney for Debtor

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